

1 JOSHUA A. SLIKER, ESQ  
Nevada Bar No. 12493  
2 KATLYN M. BRADY  
Nevada Bar No. 14173  
3 JACKSON LEWIS P.C.  
300 South Fourth Street, Suite 900  
4 Las Vegas, Nevada 89101  
5 Telephone: (702) 921-2460  
Email: [joshua.sliker@jacksonlewis.com](mailto:joshua.sliker@jacksonlewis.com)  
6 [katlyn.brady@jacksonlewis.com](mailto:katlyn.brady@jacksonlewis.com)

7 *Attorneys for Defendant*  
8 *Crème De La Crème, LLC*

9 UNITED STATES DISTRICT COURT  
10 DISTRICT OF NEVADA

11 VENESSIA BUMPAS,  
12 Plaintiff,

13 vs.

14 CRÈME DE LA CRÈME, INC., a foreign  
15 corporation; DOES 1-10; ROE I-X,  
16 Defendants.

Case No.

**NOTICE TO FEDERAL COURT OF  
REMOVAL OF CIVIL ACTION  
FROM STATE COURT**

17 Pursuant to 28 U.S.C. § 1332(d), Defendant hereby notifies the Court of the removal of  
18 *Venessia Bumpas v. Crème De La Crème, Inc. a foreign corporation, DOES 1-10, and Roe I-X*,  
19 Case No. A-22-851247-C, which was filed in the Eighth Judicial District Court in Clark County,  
20 Nevada. In support of said removal, Defendant states as follows:

21 1. On April 18, 2022, an action was commenced in the Eighth Judicial District Court  
22 of Clark County, Nevada, entitled *Venessia Bumpas v. Crème De La Crème, Inc. a foreign*  
23 *corporation, DOES 1-10, and Roe I-X*. A copy of the Complaint is attached hereto as **Exhibit A**.

24 2. Defendant was served with the Summons and Complaint on April 29, 2022, with a  
25 copy of the Complaint and a Summons issued by the state court on or about April 18, 2022. A copy  
26 of the Summons is attached hereto as **Exhibit B**.

27  
28

3. This action is properly removed to federal court under federal question jurisdiction because Plaintiff's Complaint contains claims which arise under federal law, specifically, 29 U.S.C. § 2612, the Family and Medical Leave Act.

4. This Notice of Removal is being filed within thirty (30) days of receipt of any pleadings setting forth the claim for relief upon which the action is based and is, therefore, timely under 28 U.S.C. § 1331 and § 1446(b).

5. This action is a civil action of which this Court has original jurisdiction under 28 U.S.C. § 1331 and is one which may be removed to this court pursuant to the provisions of 28 U.S.C. § 1441(b), in that it is a civil action arising under the Constitution, laws, or treaties of the United States. Specifically, Plaintiff alleges conduct in violation of Title VII of the Civil Rights Act of 1964, 42 U.S.C. §2000e and Title VII of the Civil Rights Act of 1991, 42 U.S.C. §1981. Any remaining state law claims are also properly removed pursuant to the Court's supplemental jurisdiction. 28 U.S.C. § 1367(a).

6. Venue is proper in this Court as this is the court for the district and division embracing the place where the action is pending in state Court. 28 U.S.C. § 1391.

WHEREFORE, Defendants pray that the above-referenced action now pending in the Eighth Judicial District Court of the State of Nevada in and for the County of Clark be removed therefrom to this Court.

Dated this 19th day of May, 2022.

**JACKSON LEWIS P.C.**

/s/ Joshua A. Sliker

**JOSHUA A. SLIKER, ESQ**

Nevada Bar No. 12493

KATLYN M. BRADY

**Nevada Bar No. 14173**

**300 South Fourth Street, Suite 900**

Las Vegas, Nevada 89101

*Attorneys for Defendant*

*Crème De La Crème, Inc*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I am an employee of Jackson Lewis P.C., and that on this 19th day of May, 2022, I caused to be served via the Court's CM/ECF Filing, a true and correct copy of the above foregoing **NOTICE TO FEDERAL COURT OF REMOVAL OF CIVIL ACTION FROM STATE COURT** properly addressed to the following:

Kirk T. Kennedy, Esq.  
815 S. Casino Center Blvd.  
Las Vegas, Nevada 89101

*Attorneys for Plaintiff  
Venessia Bumpas*

/s/ Wende Hughey  
Employee of Jackson Lewis P.C.